

Robert D. Bradshaw
PO Box 473
1530 W. Trout Creek Road
Calder, Idaho 83808
Phone 208-245-1691

Plaintiff, Pro Se

FILED
Clerk
District Court

APR 24 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW

) Civil Action No. 05-0027

Plaintiff

v.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS (hereafter referred to
as the CNMI);
et. al.

Defendants

) **MOTION TO CLERK OF COURT**
) **TO ENTER A DEFAULT**
) **JUDGMENT AGAINST**
) **DEFENDANT**
) **JAY H. SORENSEN**
)

TO THE CLERK OF THE US DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

1. Comes plaintiff **ROBERT D. BRADSHAW** in Civil Case 05-0027 to petition the court to enter a default judgment against Defendant **JAY H. SORENSEN** for the amount as claimed in the complaint, as amended, plus costs because defendant **SORENSEN** has failed to appear and to respond to the Second Amended Complaint served on him.

2. The rules of the court are plain and unambiguous regarding service and the duty of those served to respond to an amended complaint. Defendant **SORENSEN** is a lawyer and should understand this matter.

3. On the JAY H. SORENSEN Second Amended Complaint, default commenced on Apr 17, 2006 when Defendant SORENSEN failed to appear and answer the Second Amended Complaint served on him.

4. Plaintiff's Affidavit on default includes bill of costs for cases 05-0027 as well as the preceding costs on CNMI case 96-1320 and USDC ID case 05-0084.

5. Actual damages claimed are \$8,130.00 (including costs from 96-1320 and 05-0084); punitive, exemplary, compensatory, special, general and other damages are \$837,000.00; and costs for 05-0027 are \$12,898.00--all of which total to \$858,028.00.

6. Actual damages of \$140,000.00 are further claimed as due the CNMI.

7. As this case involves a failure to appear with a sum which can be calculated as certain, as defined in rule 55 of the Federal Rules of Civil Process, request that the Clerk of the US District Court for the Northern Mariana Islands enter a default judgment against Defendant JAY H. SORENSEN.


Robert D. Bradshaw, Plaintiff, Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of April 2006, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022
Kristin St Peter, Asst Attorney General, Caller Box 10007, Capitol Hill, Saipan, MP 96950
Patrick Civile, Civile & Tang, PLLC, PMB 86, PO Box 10003, Saipan, MP 96950


Robert D. Bradshaw, Plaintiff, Pro Se